

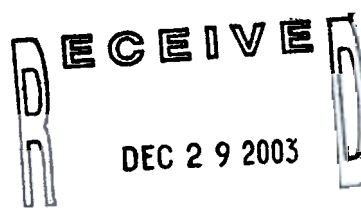
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December 29, 2003

Historic District Commission
City of Rockville
Rockville City Hall
111 Maryland Avenue
Rockville, MD 20850

RE: Evaluation for historical, architectural or cultural significance;
Activities Building at Chestnut Lodge, 500 West Montgomery Avenue

Dear Ms. Neal Powell and Members of the Historic District Commission:

After the Commission's public hearing on December 18, Judy Christensen was kind enough to call and advise us that my remarks dealing with the expansion of the existing West Montgomery Avenue historic district were unnecessary since it is intended that, if the Activities Building is designated as an historic resource, it would be the subject of its own single site district.

I appreciate Ms. Christensen's phone call and clarification, since the Maryland Historic Trust form, under "Primary Location of Additional Data" suggested that the Activities Building would be a "contributing resource in a local historic district". Accordingly, I withdraw my comments about the difficulty of constructing an expanded West Montgomery Avenue historic district to include the Activities Building.

On the other hand, if the Activities Building is thought to be the subject of a single site historic district, then I did want to take the opportunity to remind you of your high threshold for designation of such sites. The attached table indicates that no single-site historic district contains a building constructed later than 1935.

Furthermore, I have attached a copy of the City of Rockville Comprehensive Master Plan dated November 12, 2002 on which we have highlighted the language establishing the high standard for single site historic districts:

"Single site historic districts are held to a higher standard than contributing sites in a historic district that overall exemplify a particular period of history or development."

In my testimony, I indicated that it was the belief of our client's development team, reiterated emphatically by the property owner, that the Activities Building was not meritorious of designation under the high standard set for single site historic districts. I used the term "marginal" in my description of the importance of the structure. We believe that when you read the comprehensive analysis to be provided by Associated Companies' architectural historians, you will conclude that the Activities Building does not reach the level of importance that was suggested by other speakers during last Thursday evening's presentation, in the multiple categories of (a) architecture (as a good example of the Modernist Style), (b) as a mental health facility, and (c) as representative of the work of Chloethiel Woodard Smith.

Thank you for your consideration of these comments and of the additional materials which we will be submitting to you in the near future.

Sincerely yours,

MILLER, MILLER & CANBY

A handwritten signature in dark ink that reads "JODY KLINE". The signature is written in a cursive, slightly stylized font. Above the signature is a horizontal line.

Jody S. Kline

JSK/dlt

Enclosure

cc: Judy Christensen
Cindy Kebba
Anne Brockett
Robin Ziek
Bob Spalding
Kate Kuranda
Jack Cohen
Morty Levine

SINGLE-SITE HISTORIC DISTRICTS
City of Rockville

| Single-Site Historic Districts | Address | Date of Completion of Construction | Date of Designation |
|---|-----------------------------|---|----------------------------|
| Allnutt House | 541 Beall Ave. | 1890 | 1974 |
| Carver High School | 850 Hungerford Dr. | 1951 | 2002 |
| Evans Summer House | 117 S. Van Buren St. | 1923 | 2002 |
| Flint Hill Farm/ Hurley-Carter House | 411 Feather Rock Ct. | 1870 | 2000 |
| Haiti Cemetery | 205 Martin's Lane | Late 19 th Cent. | 2002 |
| Hattie-Kingdon House | 300 Reading Ave. | Late 19 th Cent. | 2002 |
| Hipsley-Thompson House | 701 Grandin Ave. | Late 19 th Cent. | 2002 |
| Homewood | 550 Reading Ave. | c. 1900 | 2002 |
| Judge Delashmutt House | 119 Forest Ave. | 1928 | 2002 |
| Lincoln High School | 595 N. Stonestreet | 1935 | 1989 |
| Mrs. Rickett's Cottage | 710 W. Montgomery Ave. | 1887 | 2002 |
| Reuben Hill House | 305 Lincoln Ave. | 1880 | 2002 |
| Rockville Cemetery | Baltimore Rd. & Avery Rd. | 1739 | 2002 |
| Rose Hill Farm and Mansion | 215 Autumn Wind Way | 1830-1849 | 2000 |
| Ross/Powell/Crutchfield House | 22 Martin's Lane | 1850's | 2003 |
| Steinberg House | 110 S. Adams St. | 1929 | 2003 |
| Wootton's Mill Miller's House | 8 Camden Court | 1790 (expanded in 19 th Cent.) | 2000 |
| Wootton's Mill | Aintree Drive Watt's Branch | 19 th Cent. | 2000 |

Eligibility Criteria for Historic District Designation

Rockville's eligibility criteria for historic district designation are based on similar standards employed by the U.S. Department of the Interior for properties eligible to be placed on the National Register of Historic Places. However, local and National Register designations and associated designation processes are entirely separate. Potential historic districts (for one or multiple buildings) are evaluated for historical, cultural, architectural and design significance. Archeological sites are also eligible. Structures representing architectural styles, periods, and methods of construction which have particular significance to Rockville are given special attention. Integrity of workmanship and materials are considered. There are no date restrictions, although federal regulations require review of structures that are 50 years of age or older. The criteria are:



A. Historical and Cultural Significance

- Has character, interest or value as part of the development, heritage or cultural characteristics of the City, County, State or Nation;
- Is the site of a significant historic event;
- Is identified with a person or a group of persons who influenced society; or
- Exemplifies the cultural, economic, social, political or historic heritage of the County and its communities.

B. Architectural and Design Significance

- Embodies the distinctive characteristics of a type, period or method of construction;
- Represents the work of a master;
- Possesses high artistic values;
- Represents a significant and distinguishable entity whose components may lack individual distinction; or
- Represents an established or familiar visual feature of the neighborhood, community or county due to its singular physical characteristic or landscape.



If the HDC finds that a site meets one or more of the above criteria, the level of significance (local, state or national) is determined and the condition of the structure and site is evaluated. **Single site historic districts are held to a higher standard than contributing sites in a historic district that overall exemplify a particular period of history or development.** Based on the City's Historic District Designation Criteria, the HDC either votes to recommend or not recommend the site to the Mayor and Council for designation. The final determination of a site's legal designation as a historic